

EXHIBIT A

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

11 RICHARD KADREY, *et al.*,
12 Individual and Representative Plaintiffs,
13 v.
14 META PLATFORMS, INC., a Delaware
corporation;
15 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**[PROPOSED] ORDER ADOPTING META
PLATFORMS, INC.'S PROPOSAL
REGARDING ADDITIONAL DISCOVERY
PURSUANT TO DKT. 461**

1 On March 5, 2025, Plaintiffs and Defendant Meta Platforms, Inc. (“Meta”) filed their
 2 competing proposals pursuant to the Court’s Order (Dkt. 461). Having considered both parties’
 3 proposals, the Court hereby adopts Meta’s Proposal, rejects Plaintiffs’ proposal, and **ORDERS** the
 4 following:

5 Plaintiffs may take the following additional Rule 30(b)(1) depositions, via Zoom or other
 6 remote means, for up to the time limits below:

- 7 • Joelle Pineau – 2 hours
- 8 • Ahmad Al-Dahle – 2 hours
- 9 • Melanie Kambadur – 2 hours
- 10 • Todor Mihaylov – 2 hours
- 11 • Xiaolan Wang – 3 hours
- 12 • Nikolay Bashlykov – 2 hours

13 With respect to expert reports:

- 14 • Plaintiffs may elect to serve a reply report from Dr. Jonathan Krein to Ms. Frederiksen-
 Cross’s February 11, 2025 rebuttal report. This reply report is limited to specifically
 responding on the topic of “seeding” addressed in Ms. Frederiksen-Cross’s February
 10, 2025 rebuttal expert report, which rebuts Dr. Krein’s January 10, 2025 Opening
 Report, which was limited to the theory of “seeding.” Plaintiffs may not expand the
 scope of their reply report to the newly asserted theory of “leeching.” Any such report
 by Dr. Krein shall be served within 7 days of this Order, and Meta may take a continued
 deposition of Dr. Krein regarding this reply report (up to three hours).
- 22 • If Plaintiffs elect to serve a reply report from Dr. Krein, Meta may serve a further sur-
 reply report from Ms. Frederiksen-Cross no later than 7 days from service of Dr. Krein’s
 reply report, and Plaintiffs may take a continued deposition of Ms. Frederiksen-Cross
 regarding this sur-reply report (up to three hours).
- 26 • To the extent Meta seeks to challenge any aspect of Dr. Krein’s reply report under
 Daubert or Rule 37, Meta may do so no later than 7 days from Dr. Krein’s continued
 deposition.

1 • No other expert reports will be permitted. In particular, the February 26, 2025 report of
2 Dr. David Choffnes is deemed not timely served and not part of the record of this case.
3 No additional written discovery is permitted.

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5 **IT IS HEREBY ORDERED.**

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7 Dated: _____

8 _____
9 HON. VINCE CHHABRIA
10 UNITED STATES DISTRICT JUDGE

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